EXHIBIT 2

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

JESSE MEYER, an individual, on his own behalf and on behalf of all others similarly situated,

Plaintiff,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC, a Delaware limited liability company, and DOES 1-100, inclusive,

Defendant.

Case No. 37-2011-00083047-CU-BT-CTL

[Assigned for all purposes to the Honorable John S. Meyer]

DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S ANSWERS TO PLAINTIFF JESSE MEYER'S FIRST SET OF SPECIAL INTERROGATORIES

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Such interrogatories would require PRA to search for information generated both before and after relevant time periods, including time periods that have no bearing on the issues in dispute in this litigation.

7. PRA objects to each Interrogatory to the extent that it seeks information or documents that are not in the possession, custody, or control of PRA, or that cannot be located by a reasonable search.

8. PRA objects to Plaintiff's defined terms to the extent that they are overly broad, unduly burdensome, or are vague or ambiguous. PRA specifically objects to Plaintiff's definition of "IDENTIFY THE DIALER" and "SKIP-TRACED TELEPHONE NUMBER" as overly broad and unduly burdensome.

9. The following Answers are based upon information and writings presently available to and located by PRA and its counsel. PRA has not completed discovery or its preparation for trial. The Answers presented herein are made without prejudice to PRA's right to produce evidence of any additional facts or to supplement these Answers in any way. No incidental or implied admissions are intended by the Answers. Nothing contained herein shall be construed as an admission relative to the existence or possession of any information, and none of the Answers is an admission respecting the relevance or admissibility of any fact. The fact that PRA has answered any Interrogatory in part or in full is not a waiver of any part of any objection to any Interrogatory. PRA reserves the right to supplement these Answers at a later date.

ANSWERS TO INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

IDENTIFY THE DIALER that PRA used to dial the TELEPHONE NUMBER on September 1, 2010.

(As used in these Requests for Admission [sic], (1) "PRA" refers to Portfolio Recovery Associates, LLC, its agents, partners, attorneys, servants, employees, assignees, lessees, affiliates, and/or anyone acting on behalf of it, and/or any affiliate, subsidiary, parent or related corporation, partnership or entity, and/or anyone acting for or on behalf of any such subsidiary, related corporation, parent, partnership, entity, or natural person; (2) "TELEPHONE NUMBER" means telephone number (510) 228-8113; and (3) "IDENTIFY THE DIALER" means that PRA's response should state the name or number of the manufacturer, product line, model number or version, serial number, and FCC/ACTA registration number of the electronic device used to dial the TELEPHONE NUMBER, including both hardware and software components, or the name and position of the natural person who manually dialed the TELEPHONE NUMBER.)

ANSWER:

PRA incorporates by reference its general objections. PRA further objects that this Interrogatory's definition of IDENTIFY THE DIALER in effect creates multiple subparts contrary to California Code of Civil Procedure §2050.060 (f). Subject to and without waiving the foregoing objections, PRA states that the dialer it used to dial the TELEPHONE NUMBER on September 1, 2010 was an Avaya Proactive Contact Dialer. The serial number for the dialer is 08D901010585, the FCC registration number is AV1USA-2801-MA-T, the CPU model is HP Proliant DL385 G2, Switch model number PG230, and the APC version number is 4.1.0.

SPECIAL INTERROGATORY NO. 2:

IDENTIFY THE DIALER that PRA used to dial the TELEPHONE NUMBER on November 4, 2010.

ANSWER:

PRA incorporates by reference its general objections. PRA further objects that this Interrogatory's definition of IDENTIFY THE DIALER in effect creates multiple subparts contrary to California Code of Civil Procedure §2050.060 (f). Subject to and without waiving the foregoing objections, PRA states that the dialer it used to dial the TELEPHONE NUMBER on November 4, 2010 was an Avaya Proactive Contact Dialer. The serial number for the dialer is 06D902010244, the FCC registration number is AV1USA-2801-MA-T, the CPU model is HP Proliant DL385 G2, Switch model number PG230, and the APC version number is 4.1.0.

SPECIAL INTERROGATORY NO. 3:

IDENTIFY THE DIALER that PRA used to dial the TELEPHONE NUMBER on December 14, 2010.

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ANSWER:

PRA incorporates by reference its general objections. PRA further objects that this Interrogatory's definition of IDENTIFY THE DIALER in effect creates multiple subparts contrary to California Code of Civil Procedure §2050.060(f). Subject to and without waiving the foregoing objections, PRA states that the dialer it used to dial the TELEPHONE NUMBER on December 14, 2010 was an Avaya Proactive Contact Dialer. The serial number for the dialer is 06D902010244, the FCC registration number is AV1USA-2801-MA-T, the CPU model is HP Proliant DL385 G2, Switch model number PG230, and the APC version number is 4.1.0.

SPECIAL INTERROGATORY NO. 4:

IDENTIFY THE DIALER that PRA used to dial the TELEPHONE NUMBER on January 4, 2011.

ANSWER:

PRA incorporates by reference its general objections. PRA further objects that this Interrogatory's definition of IDENTIFY THE DIALER in effect creates multiple subparts contrary to California Code of Civil Procedure §2050.060(f). unnecessarily compound. Subject to and without waiving the foregoing objections, PRA stated that the dialer it used to dial the TELEPHONE NUMBER on January 4, 2010 was an Avaya Proactive Contact Dialer. The serial number for the dialer is 06D902010244, the FCC registration number is AV1USA-2801-MA-T, the CPU model is HP Proliant DL385 G2, Switch model number PG230, and the APC version number is 4.1.0.

SPECIAL INTERROGATORY NO. 5:

State every telephone number that terminates at the electronic device that PRA used to dial the TELEPHONE NUMBER on September 1, 2010.

ANSWER:

PRA incorporates by reference its General Objections. PRA objects because the phrase "telephone number that terminates at the electronic device" is vague and ambiguous. PRA also objects that the Interrogatory is overly broad and is unlikely to lead to discoverable information. For these reasons, PRA will not respond to this Interrogatory.

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SPECIAL INTERROGATORY NO. 6:

State every telephone number that terminates at the electronic device that PRA used to dial the TELEPHONE NUMBER on November 4, 2010.

ANSWER:

PRA incorporates by reference its General Objections. PRA objects because the phrase "telephone number that terminates at the electronic device" is vague and ambiguous. PRA also objects that the Interrogatory is overly broad and is unlikely to lead to discoverable information. For these reasons, PRA will not respond to this Interrogatory.

SPECIAL INTERROGATORY NO. 7:

State every telephone number that terminates at the electronic device that PRA used to dial the TELEPHONE NUMBER on December 14, 2010.

ANSWER:

PRA incorporates by reference its General Objections. PRA objects because the phrase "telephone number that terminates at the electronic device" is vague and ambiguous. PRA also objects that the Interrogatory is overly broad and is unlikely to lead to discoverable information. For these reasons, PRA will not respond to this Interrogatory.

SPECIAL INTERROGATORY NO. 8:

State every telephone number that terminates at the electronic device that PRA used to dial the TELEPHONE NUMBER on January 4, 2011.

ANSWER:

PRA incorporates by reference its General Objections. PRA objects because the phrase "telephone number that terminates at the electronic device" is vague and ambiguous. PRA also objects that the Interrogatory is overly broad and is unlikely to lead to discoverable information. For these reasons, PRA will not respond to this Interrogatory.

SPECIAL INTERROGATORY NO. 9:

State the number of calls PRA has made to CALIFORNIA RESIDENT'S SKIP-TRACED TELEPHONE NUMBERS since January 4, 2007.

(As used in these Requests for Admission [sic], (1) the phrase "CALIFORNIA

RESIDENT" means a person whom PRA's records identify as residing in California; (2) "CREDITOR" has the same meaning as it does in 15 U.S.C. § 1692a and (3) the phrase "SKIP-TRACED TELEPHONE NUMBER" means a telephone number that PRA did not obtain either from a CREDITOR or from the person that uses that cellular telephone number.)

ANSWER:

PRA incorporates by reference its general objections. PRA objects to this Interrogatory as overly broad and unduly burdensome. PRA objects to the definition of "SKIP-TRACED TELEPHONE NUMBER" as overly broad and unduly burdensome. PRA objects to the extent that this Interrogatory seeks documents or information that are not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, PRA refers Plaintiff to a document produced in response to Request for Production of Documents Number 1 from which PRA can ascertain the following information: (1) the telephone number called, (2) whether PRA has a record of the number being skip-traced, and (3) whether the telephone number has a California area code. PRA cannot verify whether these telephone numbers belong to California residents, but rather only that these individuals have a cell phone with a California area code and that the number was obtained through skip tracing.

DATED: April 1, 2011

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By ______________________

Edward D. Lodgen
Julia V. Lee
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PORTFOLIO RECOVERY ASSOCIATES, LLC

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VERIFICATION

I am a Vice President for defendant, Portfolio Recovery Associates, LLC, a party to this action. I have read the foregoing DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S ANSWERS TO PLAINTIFF JESSE MEYER'S SPECIAL INTERROGATORIES, SET ONE and am authorized to sign this Verification. I am informed that no single officer of Portfolio Recovery Associates, LLC has personal knowledge of all matters stated in the foregoing responses, that authorized employees, agents, have assembled the facts stated in such responses and/or legal representatives of Portfolio Recovery Associates, LLC. I am further informed and believe and on that ground allege that the facts stated in such responses are true and correct, based on the records of Portfolio Recovery Associates, LLC and information reasonably available to its employees, agents, and/or legal representatives.

Executed on April 7, 2011, in Norfolk, Virginia.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

[signature]

Robert Rey